

JRO:CLI:kap 37166 \pleading\37166memoinsupportofmtcai.wpd

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLINE DACOSTA, as Personal	:	
Representative and Administratrix for the	:	
Estate of JOSE L. DACOSTA, JR.	:	
	:	
VS.	:	C.A. NO. 04CV12059 JLT
	:	
CPR FISHING, INC.	:	
	:	
PEARL BEAUVAIS, as Personal	:	
Representative and Administratrix for the	:	
Estate of JOHN BEAUVAIS	:	
	:	
VS.	:	C.A. NO. 04-12057 NG
	:	
CPR FISHING, INC.	:	

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S
MOTION TO COMPEL ANSWERS TO INTERROGATORIES

In support of its motion to compel answers to interrogatories, the defendant states that the plaintiff, Caroline DaCosta has failed to timely respond or object to the defendant's interrogatories. Accordingly, the defendant pray that the plaintiff be compelled to file answers to interrogatories within twenty (20) days of the date of this court's order.

DEFENDANT,
By its Attorney,



J. Renn Olenn, Esq. #642090
O'LENN & PENZA, LLP
530 Greenwich Avenue
Warwick, RI 02886
PHONE: (401) 737-3700
FAX: (401) 737-5499

CERTIFICATION

I certify that I sent a true copy of the within on November 2, 2005 to:

Thomas J. Hunt, Esq.
18 North Water Street
New Bedford, MA 02740

Kendall Pascucci